



**National  
SAFE SKIES  
Alliance**

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September 6, 2000

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St., S.W.  
Washington, DC 20554

**RE: ULTRA-WIDEBAND ET, Docket 98-153**

Dear Ms. Salas:

In response to the FCC's request for comment on the Notice of Proposed Rule Making, National Safe Skies Alliance would like to support the proposal to permit unlicensed operation of ultra-wideband technology. National Safe Skies Alliance is a non-profit, membership-based organization established in 1997. A list of our members is attached. Safe Skies facilitates application of air security technology and serves as an independent testing organization. The mission of Safe Skies is to serve aviation by providing impartial and effective testing and evaluation of safety and security devices and systems, and to provide an impetus for pre-competitive research and development.

In the field of aviation safety, the use of ultra-wideband technology would allow development of equipment to detect runway incursions. At airports of all sizes worldwide, runway incursion is a major threat to passengers, either through intentional sabotage or by accidental interference. Equipment utilizing ultra-wideband radar could provide security personnel with the ability to locate runway intruders before they could interfere with aircraft on takeoff or landing, or while parked. Currently runways and associated areas may be secured only by physical barriers such as fences, or patrolled by security personnel. Ultra-wideband technology can make both approaches more effective.

Runway inspection devices utilizing this technology also stand out as a powerful tool to improve aviation safety. Inspections could be conducted more efficiently and thoroughly by being able to peer beneath the runway surface in search of voids and other developing conditions that would need to be corrected in order to maintain safe operation.

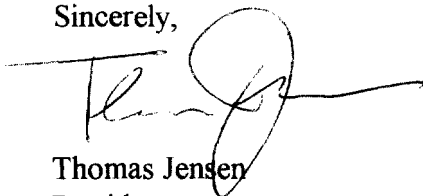
Ultra-wideband technology also holds great promise for facilitating wireless distribution of data over relatively short distances within airport passenger terminals and aircraft maintenance facilities. We believe ultra-wideband radio can supplement existing inside radio links so that flight support personnel may communicate more efficiently, be located with greater ease, and have wireless access to substantially more information than can be transported over currently available systems. More efficient movement of information and tracking can lead to increased security in ground-based support of aviation.

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We recognize that consideration of the use of ultra-wideband technology involves the issue of compatibility with GPS systems. We believe GPS is a valuable tool that must be maintained. At the same time, we do not believe that the Commission is necessarily faced with an "either-or" choice. We trust that FCC-supported testing will encourage both GPS receiver manufacturers and ultra-wideband technology proponents to arrive at approaches consistent with a safe operating environment.

With the security of the travelling public foremost, National Safe Skies Alliance is hopeful that the FCC will move forward with adoption of regulations containing minimal constraints to allow the use of ultra-wideband technology.

Sincerely,

A handwritten signature in black ink, appearing to read 'Thomas Jensen', with a large, stylized loop at the end.

Thomas Jensen  
President

attachment

# Safe Skies Member Institutions

## August 2000

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### ■ Government, Education, Airports and Associations

Air Line Pilots Association  
Airports Council International  
Auburn University  
Embry-Riddle Aeronautical University  
Greater Orlando Aviation Authority  
Hartsfield International Airport  
Los Angeles World Airports  
Metropolitan Airports Commission  
Metropolitan Knoxville Airport Authority  
Oak Ridge National Laboratory  
O'Hare International Airport  
Oklahoma Aeronautical & Space Commission  
Sandia National Laboratory  
Tennessee Air National Guard  
The University of Tennessee

**The National Safe Skies Alliance is a 501(c)3 non-profit organization formed in 1997 to serve aviation by providing impartial and effective testing and evaluation of safety and security devices and systems, and to provide an impetus for pre-competitive research and development. Funding for National Safe Skies Alliance is provided by its member institutions and by the U.S. Department of Transportation, Federal Aviation Administration.**

### ■ Corporate

American Engineering, Inc.  
Barber-Colman Co.  
CTI  
Delta Air Lines, Inc.  
Dynasafe AB  
Energy Technologies, Inc.  
EyeCast  
FMC  
Frontline International  
Galaxy Scientific Corp.  
Georal International of New York  
Heimann Systems Corp.  
Honeywell Technology Center  
Insight Detection Systems  
InVision Technologies, Inc.  
Ion Track Instruments  
Laser Data Command  
Lockheed-Martin Energy Systems  
Nuclear Safeguards & Security  
Pinkerton Government Services  
Radian International  
Tennyson Biometrics Systems, Inc.  
Time Domain  
Transport Canada  
TRW, Inc.  
Viking Venture Norway  
YXLON International

